

Mark M. Medvesky, Esquire

Attorney I.D. #68350

Wells, Hoffman, Holloway & Medvesky, LLP

601 E. Broad St, Ste 110

Souderton, PA 18964

(610) 323-7464

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

In re: Anthony S. Nembhard, Jr. and	:	Case No. 20-10906-amc
Lauren C. Nembhard	:	
Debtors	:	
.....	:	Chapter 13
	:	
Freedom Mortgage Corporation	:	
Movant	:	
v.	:	
	:	
Anthony S. Nembhard, Jr. and	:	11 U.S.C. §362
Lauren C. Nembhard	:	
	:	
Scott F. Waterman, Esquire (Trustee)	:	Date: January 13, 2021
	:	Hearing: 11:00 am
	:	Courtroom 4
Respondents	:	United States Bankruptcy Court
	:	900 Market Street, Philadelphia PA
.....	:	

**DEBTORS' RESPONSE TO MOTION FOR RELIEF FROM AUTOMATIC STAY UNDER
§362 PURSUANT TO BANKRUPTCY PROCEDURE RULE 4001**

Anthony S. Nembhard, Jr. and Lauren C. Nembhard, Debtors and Respondents, by and through his attorney, Mark M. Medvesky, Esquire, hereby file this response to the Motion for Relief from the Automatic Stay filed by Freedom Mortgage Corporation and respectfully aver as follows:

1. The court record speaks for itself and no response is needed.
2. The court record speaks for itself and no response is needed.
3. This averment is denied and proof of same is demanded at the time of the hearing.
4. This averment is denied and proof of same is demanded at the time of the hearing.
5. This averment is denied and proof of same is demanded at the time of the hearing.
6. The court record speaks for itself and no response is needed.

7. This averment is denied and proof of same is demanded at the time of the hearing.
8. This averment is denied and proof of same is demanded at the time of the hearing.
9. This averment is denied and proof of same is demanded at the time of the hearing.
10. This averment is denied and proof of same is demanded at the time of the hearing.
11. This averment is denied and proof of same is demanded at the time of the hearing.
12. This averment is denied and proof of same is demanded at the time of the hearing.
13. This averment is denied and proof of same is demanded at the time of the hearing.

WHEREFORE, Debtors, by and through their attorney, Mark M. Medvesky, Esquire, respectfully requests that this Court enter an Order dismissing this motion and denying all request relief.

Respectfully Submitted,

BY: /s/Mark M. Medvesky
Mark M. Medvesky, Esquire
Attorney for Debtor